

REMARKS

Request for Reconsideration

Applicants have carefully considered the matters raised by the Examiner in the outstanding Office Action but remain of the opinion that patentable subject matter is present. Applicants respectfully request reconsideration of the Examiner's position based on the above amendments to the claims and the following remarks.

Present Invention

One of the unique aspects of the present Invention is the fact that both the first process and the second process are conducted at atmospheric pressure in two separate discharge spaces. Because the two processes are performed in two separate discharge spaces, the film can be formed at a high rate, with a low production cost.

Respectfully, the Prior Art does not teach or suggest the process of the present Invention.

Claims Status

Claims 1-26 are pending in this Application.

The independent claims, Claims 1, 2, 3, and 17, have been amended herein to more particularly point out and distinctly claim the fact that the substrate is moved between the first discharge space and the second discharge space, in order to emphasize the fact that the first discharge space and the second discharge are two physically separate places in the process. Probably, the best support for this claim limitation can be seen in Figure 1. As disclosed on page 44 in the paragraph bridging pages 44 and 45, substrate 4 is conveyed between the first process and the second process, the first process being designated as P1 and the second process being designated as P2 in Fig. 2. Separation of the two processes as well as the movement of the substrate between the two is also clearly illustrated in Figures 2, 3, and 4. Respectfully, no new matter has been added by way of this amendment.

Claim 17 has also been amended herein to make explicit the fact that there is a first discharge space wherein the first process is performed and a second discharge space where the second process is performed. Claims 19 and 21 have also been amended because of the amendments to Claim 17.

Respectfully, no new matter has been added by way of these amendments.

Prior Art Rejection

Claims 1-3, 12 and 14-16 had been rejected as being unpatentable over a combination of Horiike and Fukada '479; and Claims 4-11, 13 and 17-26 had been rejected as being unpatentable over a combination of Horiike and Fukada '136.

Horiike discloses a single process chamber, Chamber 3, as illustrated in Figure 1, in which a vacuum process is conducted. Horiike does disclose that two processes are conducted in his single chamber, however, both are conducted under vacuum and require a specific time for conducting the various processes as illustrated in Figure 3.

Both Fukada '479 and Fukada '136 disclose atmospheric processes which are conducted within a single chamber at atmospheric conditions.

Thus, the combination of Horiike with either of the two Fukada's references disclose a single chamber for conducting both processes. This is in direct contrast with

the present Invention which specifically requires two separate spaces and the step of moving the substrate between the two separate spaces. Thus, the combination of Horiike with Fukada does not result in the present Invention even if one were to make such a combination.

Furthermore, it is submitted that a combination of either of Fukada's with Horiike is inappropriate because Horiike specifically discloses that his process is conducted in a vacuum chamber while both Fukada's disclose atmospheric conditions for performing their processes. Thus, Horiike is in direct contrast with the two Fukada's because the two Fukada's teach an atmospheric process.

Moreover, as brought out in Claims 15 and 24, by employing two separate chambers, the first process and the second process are alternatively repeated. By moving the substrate back and forth between the first processes and the second processes allows for building up of a plurality of layers. This is clearly superior to the teachings of Horiike which require a complicated timing sequence as illustrated in Figure 3.

Conclusion

In view of the foregoing, it is respectfully submitted that the Application is in condition for allowance and such action is respectfully requested.

Should any fees or extensions of time be necessary in order to maintain this Application in pending condition, appropriate requests are hereby made and authorization is given to debit account #02-2275.

Respectfully submitted,

LUCAS & MERCANTI, LLP

By:

Donald C Lucas
Donald C. Lucas, Reg. # 31,275
(Attorney for Applicant)
475 Park Avenue South
New York, New York 10016
Tel. # (212) 661-8000

DCL/mr